

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

---

VISION INDUSTRIES GROUP, INC., )  
Plaintiff, ) Case No. 2:18-cv-6296 (ES)  
  ) (CLW)  
-- against -- )  
ACU PLASMOLD, INC., ABC COMPANIES 1-10 and )  
XYZ CORPORATIONS 1-10, )  
Defendants. )  
  )  
  
STIPULATIONS AND  
[PROPOSED] ORDER  
REGARDING QUACH  
COMPUTER IMAGING

---

**THIS MATTER** having come before the Court for an by way of text order of September **11, 2023**, and the parties having agreed to the stipulations set forth below, and for good cause shown,

**IT IS on this \_\_\_\_\_ day of \_\_\_\_\_, 2023, hereby stipulated**

**AS FOLLOWS:**

1. Defendant shall arrange for Computer Forensics Services LLC to produce copies of all the imaging he performed in regard to Mr. John Quach's computer to both the Plaintiff and the Defendant; and it is further stipulated that
2. In the event that Plaintiff Vision Industries Group, Inc. offers the contents of Mr. Quach's computer into evidence at trial, both parties have waived the right to object on the grounds of authenticity and/or chain of custody.
3. In the event that Plaintiff Vision Industries Group, Inc. offers the contents of Mr. Quach's computer into evidence at trial, both parties stipulate to the facts related to the data recovered by Computer Forensics Services LLC from the computers belonging to John Quach, as set forth in Mr. Lanterman's letter filed by Plaintiff Vision Industries Group,

Inc. in this case as docket number 166.

4. All other objections are preserved by both parties.

---

Edward Miller, Esq.

---

---

Michael Cukor, Esq.

---

Avram E. Frisch LLC  
1 University Plaza,  
Suite 119  
Hackensack, NJ 07601  
*Counsel for Defendant*  
*ACU Plasrnold, Inc.*

Michael Cucor  
Rubin, Kaplan & Associates  
200 Centennial Ave., Suite 110  
Piscataway, NJ 08854-3950  
*Counsel for Plaintiff*  
*Vision Industries Group, Inc.*

SO ORDERED:

---

**HON. CATHY L. WALDOR**  
**United States Magistrate Judge.**